

Batista, Diana

From: J Warsaw <jwarshaw@warshawlawfirm.com>
Sent: Wednesday, January 23, 2019 9:53 PM
To: Batista, Diana
Cc: Jodi Howlett
Subject: [EXTERNAL] Re: Petitioners' Reply Post Submission Brief for F.H. and M.H. o/b/o J.H. v. West Morris Regional High School District BOE
Attachments: HumckelettertojudgewithExhibits12319.pdf;
HumckeFinalSupplementalPostSubmissionBrief12219.doc

Attached please find Petitioners' cover letter and Exhibits as requested, as well as Petitioners' Reply Post Submission Brief submitted in Word as requested. Thank you. Respectfully Submitted, Julie Warsaw

Julie Warsaw, Esq.
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January 23, 2019

Via Email at Diana.Batista@oal.nj.gov and priority mail

Honorable Thomas Betancourt, A.L.J.

Office of Administrative Law

State of New Jersey

33 Washington Street, 7th Floor

Newark, New Jersey 07102

Re: F.H. and M.H. o/b/o J.H. v. West Morris Regional High School District Board of
Education

OAL Docket No.: EDS 10706-2017, Agency Ref. No.: 2017 26311

Dear Judge Betancourt:

This office represents the Petitioners in the above referenced matter. As per Your Honor's request, enclosed is a list of the Petitioners' Exhibits that were entered into evidence in the due process hearing. In addition, please find Petitioners' Reply Post Submission Brief.

Thank you for your time and courtesy.

Respectfully Submitted,

By: 

Julie Warshaw, Esq.

JW/

Enclosures

cc: Jodi Howlett, Esq. (Via Email)

F.H. and M.H. (Via Email)

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January 23, 2019

Re: F.H. and M.H. o/b/o J.H. v. West Morris Regional High School District Board of Education
OAL Docket No.: EDS 10706-2017, Agency Ref. No.: 2017 26311

PETITIONERS' EXHIBITS IN EVIDENCE FROM THE DUE PROCESS ACTION

- 522- P12 Letter from Petitioners to Cusack dated 10/10/2016
523- P13 Letter from Dr. Libert dated October 11, 2016
524 P14 Email from Petitioners to Cusack dated 10/15/16
525 P19 Letter from Petitioners to Cusack
528 P25 Eligibility Meeting Participants, Evaluation Sequence, Eligibility Determination Report
529 P26 Two IEP's -one says Draft (J9)
— P27 Emails and letters from Petitioners' attorney to school district attorney
510 P29 Emails from Petitioners dated August 25, 2017 and September 8, 2017 and Joe Cusack's response dated September 11, 2017 and unsigned 504 Plan dated for September 2017 but the meeting date was December 7, 2016
511 P31 Marked for Identification- Being Successful Program Brochure
5-31 P32 Dr. Schuberth's December 13, 2017 report and Dr. Schuberth's August 21, 2017 report and Dr. Schuberth's CV
520 P33 Dr. Platt's report, Dr. Platt's draft report sent to the school district, and Dr. Platt's CV
526 P36 Purnell School Contract (J28)
529 P37 Purnell School payments (J29)
1N P40 Megan DuVall's two reports
1N P42 2017-2018 Fall Term report card
1N P43 2017-2018 Spring Term report card
1N P44 College Board Accommodation Letter
1N P46 Melissa Dolgos' CV
1N P48 Megan DuVall's CV
1N P49 Nicole Dowd's letter
1N P50/P51 Recording of May 16, 2017 IEP meeting
- then n- p 51*

JOINT EXHIBIT LIST

- J1 504 Plan dated December 7, 2016 (R1, P17)
J2 Special Education Referral dated January 3, 2017 (R2, P18)
J3 Pre-Referral Intervention Information dated January 3, 2017 (R3, P18)

- J4 Letter to Parents re: invitation to initial identification meeting dated January 3, 2017 (R4, P24)**
- J5 Letter to Parents Re: Invitation to meeting dated March 22, 2017 (R6, P24)**
- J6 Eligibility Meeting Participants (R7, P25)**
- J7 Evaluation Sequence (R8, P25)**
- J8 Eligibility Determination Report (R9, P25)**
- J9 Individualized Education Program (IEP) (R10, P26-both IEP's with the first two pages being different- one says Draft written on it)**
- J10 504 Plan second unsigned one (R11, P29)**
- J11 Mendham High School being successful program (R12, P31)**
- J12 Letter ICCP to West Morris Central High School (R13, P15)**
- J13 Letter ICCP to West Morris Central High School (R14, P16)**
- J14 Letter ICCP to Joe Cusack (R15, P20)**
- J15 Sherry Wilk Psychological Evaluation (R16, P22)**
- J16 Dr. Srinivasan Psychiatric Evaluation dated March 15, 2017 (R17, P23)**
- J17 Betina Goldberg-Rappoport Social History (R18, P21)**
- J18 Dr. Natalie Schuberth's Independent Psychoeducational evaluation (R19, P32)**
- J19 Letter from Melissa Dolgos Dated August 17, 2017 (R20, P28)**
- J20 Letter from Natalie Schuberth Dated December 13, 2017 (R21, PP32)**
- J21 Dr. Ellen Platt's Independent Psychiatric Report (R22, P33)**
- J22 Letter from Parents to Joe Cusack dated October 10, 2016 (R39, P12)**
- J23 Letter from Plaza Family Care dated October 11, 2016 (R40, P13)**
- J24 Email from [REDACTED] to Joe Cusack dated October 15, 2016 (R41, P14)**
- J25 Letter from Petitioners to Joe Cusack dated January 4, 2017 (R44, P19)**
- J26 Email from Petitioners to Joe Cusack dated September 8, 2017 (R51, P29)**
- J27 Letter to Principal Ryan from Petitioners not dated (R52, P35)**